

CLARK HILL PLLC  
CRANE M. POMERANTZ  
Nevada Bar No. 14103  
Email: [cpomerantz@clarkhill.com](mailto:cpomerantz@clarkhill.com)  
3800 Howard Hughes Parkway, Suite 500  
Las Vegas, Nevada 89169  
Telephone: (702) 826-8300  
Facsimile: (702) 862-8400

*Attorney for Defendant Telusma*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JOHN TELUSMA,

Defendant.

CASE NO. 2:17-cr-00306-JCM-PAL-16

**MOTION TO AUTHORIZE FUNDS  
FOR TRAVEL**

Defendant, John Telusma, by and through undersigned counsel, respectfully submits the Motion to Authorize Funds for Travel for the upcoming sentencing hearing on May 25, 2022. In support thereof, Mr. Telusma states as follows:

1. On October 13, 2021, the defendant appeared before the Court and pleaded guilty to Count One of the Second Superseding Criminal Indictment. Count One charged Racketeering Conspiracy, in violation of 18 U.S.C. § 1962(d).

2. Mr. Telusma's sentencing hearing is scheduled for May 25, 2022.

3. Mr. Telusma resides in Brooklyn, New York. He is not in custody.

4. Mr. Telusma has been found indigent for purposes of representation. Mr. Telusma has limited resources and does not have a regular source of income. As such, he does not have sufficient funds to pay for his travel to the District of Nevada for his sentencing hearing.

5. Undersigned counsel just learned that Mr. Telusma is exploring taking a loan in order to defray the cost of traveling to Las Vegas for sentencing. According to Mr. Telusma's Pre-Sentence Investigation Report, he has a negative net worth. *See* PSR at ¶ 125.

7. Mr. Telusma respectfully requests that the Court issue an Order directing the United States Marshal Service to pay for the cost of non-custodial transportation to be present in the District of Nevada on May 25, 2022, and to furnish Mr. Telusma with subsistence expenses, including reimbursement for lodging, meals, travel to and from the airport and to and from the courthouse.

*Attorney for Defendant Telusma*

IT IS ORDERED that the United States Marshal's Service is directed to arrange and pay for Mr. Telusma's non-custodial transportation to and from the District of Nevada for his May 25, 2022 sentencing, and reimbursement of subsistence expenses.

James C. Mahan  
Honorable James C. Mahan  
United States District Judge

**CERTIFICATE OF SERVICE**

The undersigned, an employee of Clark Hill PLLC, hereby certifies that on the 10th day of May, 2022, I served a copy of the **Motion to Authorize Funds for Travel** by electronic service to all interested parties, through the Court's electronic service (ECF) system addressed to:

Chad William McHenry chad.w.mchenry@usdoj.gov, caseview.ecf@usdoj.gov,  
debra.vainio@usdoj.gov, kelly.pearson@usdoj.gov, mayumi.coffman@usdoj.gov

Kelly K. Pearson kelly.pearson@usdoj.gov

Alexander Byrne Gottfried alexander.gottfried@usdoj.gov

/s/ Judy Estrada

An employee of Clark Hill PLC